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6 *Counsel for Defendant Atomic Workers Alliance, LLC*

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8 **UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

9 NUCLEAR CARE PARTNERS, LLC, A
Nevada Limited Liability company,

10
11 Plaintiff,

12 v.

13 RUBEN MENDOZA, an individual;
STEPHEN BURR, an individual; and
14 ATOMIC WORKERS ALLIANCE, LLC, A
Tennessee Limited liability company

15
16 Defendants.

Case No.: 2:24-cv-01441-GMN-DJA

**STIPULATION AND ORDER
EXTENDING TIME FOR DEFENDANT
STEPHEN BURR TO RESPOND TO
PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING ORDER
(FIRST REQUEST)**

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18 Plaintiff Nuclear Care Partners, LLC ("NCP"), by and through its counsel, Benjamin M.
19 Wegener, Esq., of Wegener Lane & Evans, P.C., and Defendant Stephen Burr ("Burr"), by and
20 through his counsel of record, Todd Dressel, Esq., of McGuireWoods, LLP, hereby stipulate as
21 follows:

22 1. NCP, Defendant Atomic Workers Alliance, LLC and Burr have entered into
23 preliminary discussions in good faith to fully resolve this matter without further judicial
24 involvement. While the parties have not reached any resolution, the parties have made
25 meaningful progress and would like to continue said discussions before moving forward with
26 litigation.

2. Accordingly, NCP and Burr stipulate to continue the deadline for Burr to respond to NCP's Motion for Temporary Restraining Order (ECF No. 7) by two weeks, from November 29, 2024 to December 13, 2024.

3. This is the Parties' first request for an extension.

IT IS SO STIPULATED.

DATED this 20th day of November 2024

Submitted by:

By: /s/ Benjamin M. Wegener

Michael M. Edwards, Esq.
Nevada Bar No.: 6281
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Benjamin M. Wegener, Esq.
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743 Horizon Court, Suite 200
Grand Junction, Colorado 81506
Pro Hac Vice Pending

Counsel for Plaintiff

IT IS SO ORDERED.

-and-

Dated this 20 day of November 2024.

/s/ Todd J. Dressel

Todd J. Dressel, Esq.
McGuireWoods LLP
201 Clay St., Suite 1300
San Francisco, CA 94111
Counsel for Defendant Atomic Workers Alliance, LLC


Gloria M. Navarro
United States District Judge

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CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2024, I electronically filed the foregoing document entitled **STIPULATION AND ORDER EXTENDING TIME FOR DEFENDANT STEPHEN BURR TO RESPOND TO PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER (FIRST REQUEST)** with the United States District Court, District of Nevada using the CM/ECF system and served a copy of same upon all counsel of record via the Court's electronic filing system.

/s/ Todd J. Dressel
Todd J. Dressel